

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: RICKEY AND BERNITA CARVAN, DEBTORS

CASE NO. 22-11918

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**RESPONSE TO MECHANICS BANK'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AND FOR ABANDONMENT OF  
PROPERTY FROM DEBTOR'S ESTATE**

COMES NOW, the DEBTORS, by and through counsel of record, and files this their RESPONSE to Mechanics Bank's Motion for Relief from the Automatic Stay and for Abandonment of Property from Debtor's Estate and answers by like numbered paragraphs as follows:

1. Admitted.
2. Debtors are without sufficient information to either admit or deny this paragraph at this time, therefore same is denied.
3. Admitted.
4. Denied.
5. Denied.
6. Denied.

Debtor denies the unnumbered paragraphs beginning "WHEREFORE."

Debtor further denies any allegations that are not expressly admitted above.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Court deny the Mechanics Bank's Motion for Relief from Automatic Stay and for Abandonment of Property from Debtor's Estate. Debtor further prays for any further or different relief to which they may be entitled in the premises.

RESPECTFULLY SUBMITTED this the 26th day of August, 2022.

/s/ A.E. (Rusty) Harlow, Jr.  
Harlow Law Firm  
A.E. (Rusty) Harlow, Jr.  
Kathi Chrestman Wilson

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**CERTIFICATE OF SERVICE**

I, A. E. (Rusty) Harlow, Jr., attorney for debtor, do hereby certify that I have this day served a copy of the foregoing Response via ECF notification service on Locke D.

Barkley, [lbarkley13@ecf.eqipsystems.com](mailto:lbarkley13@ecf.eqipsystems.com) , and the U.S. Trustee at

[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov) ,and Rosamond H. Posey, Attorney for Mechanics Bank at [rposey@mitchellmcnutt.com](mailto:rposey@mitchellmcnutt.com).

This the 26th day August, 2022.

/s/ A.E. (Rusty) Harlow, Jr.  
A.E. (Rusty) Harlow, Jr.